

JUL 03 2006

PATENT APPLICATION
Serial Number: 09/961,081
Attorney Docket Number: SYN 1776

REMARKS

Applicants hereby submit this Amendment A for the above-referenced patent application in response to Office Action, paper no. 20060310--date mailed: April 4, 2006; for which a response is due July 5, 2006 by a shortened statutory period for reply set to expire three [3] months from the mailing date of the Office Action.

Claims 1, 4-10, 12-13, 17-21, 23-27, 29, 31, 33-13, 45-56 and 58-62 have been rejected. Claims 1, 4-10, 12, 13, 17-21, 23-27, 29, 31, 33-43, 45-56 and 58-74 are hereby currently pending. Claims 1, 19, 20, 21, 23, 27, 31, 43, 54 and 56 are hereby currently amended. Claims 4-8, 12, 13, 17, 18, 33-39, 41, 42, 45-49, 52, 58 and 59 were previously presented. Claims 9, 10, 24-26, 29, 40, 50, 51, 53, 55 and 60-62 are original. Claims 63-74 are hereby added as new claims. Claims 2, 3, 11, 14-16, 22, 28, 30, 32, 44 and 57 were previously canceled without prejudice. No new matter has been added. Reconsideration is respectfully requested.

Claims 1, 4-10, 12-13, 17-21, 23-27, 29, 31, 33-43, 45-56 and 58-62 are rejected under 35 U.S.C. 103(a) as being unpatentable over US patent No. 6,498,794B1 ("Tsukamoto et al.") in view of US patent 6,496,519 B1 ("Russell et al.") and further in view of US patent 6,608,844 B1 ("Teodorescu et al.").

None of the cited references, alone or in combination, teach, suggest or infer the presently claimed invention.

The cited US patents: 6,498,794--"Tsukamoto et al.", in view of "Russell et al."-- 6,496,519, and further in view of " Teodorescu et al." 6,608,844 do NOT teach or suggest of Applicants' claimed invention as set forth in various of the claims, to provide a defined delay between the transfer of the respective data unit from a respective input channel to a respective output channel, as variously set forth in claims 1, 27, 31, 43, 54, and 56, and claims dependent therefrom.

In addition, the synchronous frames in Tsukamoto et al. have only frequency synchronization and not phase synchronization. Applicants' claimed invention specifies using a common time reference (CTR) (which provides for phase synchronization). Applicants' claimed invention is patently distinguishable over Tsukamoto et al.

Furthermore, the presently claimed invention (as set forth in various ones of the claims) relate to methods and apparatus for switching and grooming [and/or degrooming] data units,

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responsive to a common time reference, in a communications network in a timely manner with defined delay, while providing low switching complexity and performance guarantees, and over a plurality of communications links [with a plurality of transmission rates].

In contrast, the prior art systems and circuit-switching networks – SONET/SDH, which are still the main carrier for real-time traffic, does not use common time reference. Furthermore, the prior art does NOT teach or suggest of a mapping means operating responsive to the common time reference that provides for operating with a defined time interval for transfer of each data unit between an input channel and an output channel, as set forth in the various ones of Applicants' pending independent claims 1, 27, 31, 43, 54 and 56 (and claims dependent therefrom).

Furthermore, circuit-switching is based on extremely accurate clock frequencies (and NOT common time reference [And further, not having phase synchronization, and without byte-by-byte interleaving/multiplexing and switching (see also multiplexing actual examples in present Applicants' Fig. 62 and Fig. 64 with OC-48) (see also the currently pending claims herein.)] Thus, in SONET/SDT successive bytes belong to different SONET/SDT channels in a repetitive manner. For example: four SONET/SDT channels, Byte 1 belongs SONET/SDT channel 1, Byte 2 belongs SONET/SDT channel 2, Byte 3 belongs SONET/SDT channel 3, Byte 4 belongs SONET/SDT channel 4, Byte 5 belongs SONET/SDT channel 1, and so on. This is in contrast to the present teachings and claims, which provide, inter alia, in one embodiment all the bytes belong to SONET/SDT channel 1 and that are in the same SONET/SDH frame are groupable together and are transferrable together, i.e., non-byte interleaving (multiplexing) manner (similarly, for SONET/SDT channel 2, 3 and 4).

As discussed above, per the pending claims, ~~and~~ all network components are operating ~~of~~ with defined delay and responsive to the common time reference.

By this Amendment B, all pending claims are patentably distinguishable over all art of record. The present invention as set forth in the pending claims is patentably distinguishable over mapping of ATM cells to SONET/SDH synchronous frames.

Thus, Applicants' claimed invention is clearly patentably distinguishable over all art of record. The art cited and not relied upon has been reviewed, and it is respectfully submitted that all pending claims are patentably distinguishable over all art of record, alone or in combination.

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Applicants respectfully submit that all bases of objection and rejection have been traversed and overcome, and that the present application is in proper form for allowance. Reconsideration is requested. No new matter has been added.

The Director has previously been authorized to charge any additional fees and credit any overpayments during the pendency of this application to Sitrick & Sitrick's Deposit Account Number: 501166. No additional fee is due.

The Examiner is invited to communicate directly with the undersigned if it would in any way facilitate the prosecution of this Application.

Respectfully submitted,



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